

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Chapter 11 Case No. 20-10334 TPA
)	Related to Document Nos. 306, 303, 302, and 294
JOSEPH MARTIN THOMAS,)	
Debtor.)	

In re:)	Chapter 11 Case No. 21-10118 TPA
)	Related to Document Nos. 53, 50, 49, and 28
2374 VILLAGE COMMON DRIVE, LLC,)	
Debtor.)	

JOSEPH MARTIN THOMAS, and 2374
VILLAGE COMMON DRIVE, LLC,
Movants,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION; UNITED STATES OF
AMERICA, SMALL BUSINESS
ADMINISTRATION; ERIE COUNTY TAX
CLAIM BUREAU; MILLCREEK TOWNSHIP
TAX COLLECTOR; UNITED STATES OF
AMERICA, INTERNAL REVENUE SERVICE;
COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF REVENUE; TIAA
COMMERCIAL FINANCE, INC.;
NORTHWEST SAVINGS BANK, now known as
NORTHWEST BANK; CORE ERIE MOB, L.P.;
and JOSEPH C. KRAMER,
Respondents.

**JOINT MOTION FOR APPROVING
BIDDING PROCEDURES**

DATE AND TIME OF HEARING:
March 25, 2021 @ 10:00 a.m.

RESPONSE DEADLINE:
March 24, 2021 by Noon

**JOINT MOTION FOR ORDER APPROVING
SALE OF REAL ESTATE:**

DATE AND TIME OF HEARING:
April 28, 2021 @ 11:00 a.m.

RESPONSE DEADLINE:
April 21, 2021

SUPPLEMENTAL CERTIFICATE OF SERVICE

I, the undersigned, certify that I served, or caused to be served, on the 26th day of March, 2021, a copy of the *1) Joint Motion for Order Approving Sale of Real Estate Free and Divested of Liens; 2) Order Scheduling Date for Response and Hearing on Motion; 3) Order dated March 12, 2021, and 4) Notice of Bid Procedures, Auction and Sale Hearing Date, and Deadline to Object to Sale Motion* upon each of the following persons and parties in interest at the address shown on the attached list.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/Michael P. Kruszewski

Michael P. Kruszewski, Esquire
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Erie, Pennsylvania 16506-4508
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Counsel for Debtors

The following parties were served via First Class Mail, Postage Pre-Paid:

Core Erie MOB LP
c/of Christopher M. Montgomery Esquire
Frost Brown Todd LLC
One Columbus Center
10 West Broad Street, Suite 2300
Columbus, OH 43215-3484

Core Erie MOB LP
c/of CT Corporation System
600 North 2nd Street
Suite 401
Harrisburg, PA 17101